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PORT OF PORTLAND

December 18, 2000

Barbara Priest
UIC Program Coordinator
Oregon Department of Environmental Quality
811 SW Sixth Avenue
Portland, OR 97204

USEPA SF



1286655

Re: OAR Chapter 340 Division 44, Underground Injection Control (UIC) Program
Subject: Class V Well Registration

Dear Barbara:

The Port of Portland is submitting the attached UIC well registrations in compliance with the injection system inventory requirements in the above referenced rule.

The Port conducted an initial internal inventory of readily available Port maps, drawings and records and located potential Class V UIC wells. Field verification was then conducted to ascertain status of the potential Class V UIC well and determine the present condition for wells still in existence. Some potential Class V UIC wells discovered during the initial inventory could not be located and were assumed removed. Others were eliminated from the inventory because they did not meet applicable criteria stated in the registration requirements (e.g. septic tanks that met the exclusion criteria).

The registration includes one septic system located at Portland International Airport. The system has a 3,000 gallon capacity and currently serves less than 20 people. Although the current federal regulations do not require registration for septic systems serving less than 20 people, the DEQ proposed rule revisions will require registration for septic systems greater than 2,500 gallons. In anticipation of that requirement, we are including the tank system in this submittal.

We have not included registration for the Port's groundwater subdrain systems that are designed to convey groundwater to the stormwater system. We have asked the DEQ for a determination on this issue in our earlier letter to you dated December 18, 2000. If the DEQ determines these structures meet registration requirements, completed registrations will follow.

Although the initial inventory was scrupulous, it was not exhaustive; therefore, the Port will continue the process of record searching to identify other potential structures that may require registration.


The Port is currently incorporating the applicable requirements of the UIC rule into our business operations, including such things as revisions to contract specifications, and

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evaluation of placement and use of new wells. Future UIC Class V wells will be registered in accordance with the Division 44 UIC rule.

If you have any questions on the attached registrations, please call me at (503) 944-7642.

Sincerely,



Cheryl Koshuta
Corporate Environmental Manager

cc: Pad Quinnn, Bill Bach, Chuck Shenk, Jeff Ring, Dorothy Sperry